

Taly Goody, Esq.
Wyoming Bar No.: 8-6737
Greyson M. Goody, Esq.
GOODY LAW GROUP
58 Malaga Cove Plaza
Palos Verdes Estates, CA 90274
Telephone: (310) 893-1983
Email: taly@GoodyLawGroup.com
greyson@GoodyLawGroup.com
Attorneys for Plaintiffs

T. Michael Morgan, Esq*
Florida Bar No.: 062229
Rudwin Ayala, Esq*
Florida Bar No.: 84005
MORGAN & MORGAN, P.A
20 N. Orange Ave, Suite 1600
Orlando, FL 32801
Telephone: (407) 420-1414
Email: mmorgan@forthepeople.com
rayala@forthepeople.com
** Pro Hac Vice Attorneys for Plaintiffs*

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

STEPHANIE WADSWORTH,
Individually and as Parent and Legal
Guardian of W.W., K.W., G.W., and
L.W., minor children, and
MATTHEW WADSWORTH,

Plaintiffs,

v.

WALMART, INC. and JETSON
ELECTRIC BIKES, LLC,

Defendants.

Case No.: 2:23-cv-00118-KHR

JURY TRIAL DEMANDED

**PARTIES' JOINT MOTION FOR PERMISSION
TO BRING TANGIBLE EVIDENCE TO TRIAL**

The Parties move for an order from the Court granting their attorneys permission to enter the courthouse and pass security screening with the items

enumerated below for the trial of this case scheduled to begin on March 3, 2025. Pursuant to Local Rule 7.1(b)(1)(A), the Parties have met and conferred on this issue. Each Party maintains and preserves their objections to the use of any of these items at trial. This does not serve as a stipulation for the evidence to be used at trial, only for it to be allowed to pass through security. The items shall be brought in through security outside the presence or vision of the jury and shall be stored outside of the courtroom until a ruling on their use as demonstratives is provided by the Court.

Plaintiffs' proposed items are as follows:

1. The hoverboard that is the subject of this case;
2. Exemplar hoverboards containing lithium-ion battery packs;
3. Exemplar lithium-ion battery packs;
4. Cigarette packs containing cigarettes;
5. Cigarette lighters; and
6. Manual and/or electric screw drivers to disassemble the exemplar hoverboards.

Defendants proposed items are as follows:

1. Exemplar hoverboard containing lithium ion battery pack.

The Parties jointly file this motion and respectfully request permission to bring the above items into the courthouse and pass through security consistent with the above requirements.

Date: February 21, 2025

Respectfully Submitted,

/s/ T. Michael Morgan, Esq.

T. Michael Morgan, Esq.*

Florida Bar No.: 062229

Rudwin Ayala, Esq.*

Florida Bar No.: 84005

MORGAN & MORGAN, P.A

20 N. Orange Ave., Suite 1600

Orlando, FL 32801

Telephone: (407) 420-1414

Emails: mmorgan@forthepeople.com

Secondary email:

akelseyflowers@forthepeople.com

**Admitted Pro Hac Vice*

TALY GOODY, ESQ.

Wyoming Bar No.: 8-6737

GREYSON M. GOODY, ESQ.

GOODY LAW GROUP

58 Malaga Cove Plaza

Palos Verdes Estates, CA 90274

Telephone: (310) 893-1983

Emails: taly@GoodyLawGroup.com

greyson@GoodyLawGroup.com

Local Counsel

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 21, 2025, a true and correct copy of the foregoing was electronically served to all counsel of record.

Counsel for Defendants:

Eugene M. LaFlamme – elaflamme@MLLlaw.com

Jared B. Giroux – jguiroux@MLLlaw.com

Jillian L. Lukens – jlukens@MLLlaw.com

Brandon Pryde - bpryde@crowleyfleck.com

Timothy Stubson - tstubson@crowleyfleck.com

Holly Tysse - htysse@crowleyfleck.com

Christopher Voigt - cvoigt@crowleyfleck.com

/s/ T. Michael Morgan, Esq.
T. Michael Morgan, ESQ.*
MORGAN & MORGAN, P.A
Florida Bar No.: 062229
**Admitted Pro Hac Vice*